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COUNSEL/PARTIES OF RECORD	
SEP 21 2021	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

Representing the United States of America

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

IN THE MATTER OF THE SEARCH OF THE
 FOLLOWING DEVICES RECOVERED FROM
 THE RESIDENCE OF NORBERT
 IKWUEGBUNDO:

1-Toshiba Laptop, Serial Number 3C128680R- A1

LOCATED at: Property Room
 Homeland Security Investigations
 501 South Las Vegas Boulevard
 Las Vegas, NV 89101

Case No. 2:21-mj-00046-EJY

Filed Under Seal

IN THE MATTER OF THE SEARCH OF THE
 FOLLOWING DEVICES RECOVERED FROM
 THE RESIDENCE OF NORBERT
 IKWUEGBUNDO:

2-HP Envy Laptop, Serial Number 8CG9178667-A2

LOCATED at: Property Room
 Homeland Security Investigations
 501 South Las Vegas Boulevard
 Las Vegas, NV 89101

Case No. 2:21-mj-00047-EJY

Filed Under Seal

IN THE MATTER OF THE SEARCH OF THE
 FOLLOWING DEVICES RECOVERED FROM
 THE RESIDENCE OF NORBERT
 IKWUEGBUNDO:

Case No. 2:21-mj-00048-EJY

Filed Under Seal

3-Lenovo Laptop, Serial Number MP1KCEHQ- **A3**

LOCATED at: Property Room
Homeland Security Investigations
501 South Las Vegas Boulevard
Las Vegas, NV 89101

IN THE MATTER OF THE SEARCH OF THE
FOLLOWING DEVICES RECOVERED FROM
THE RESIDENCE OF NORBERT
IKWUEGBUNDO:

Case No. 2:21-mj-00049-EJY

Filed Under Seal

4- Mac Laptop, Serial Number C02CR5DAML7J-**A4**

LOCATED at: Property Room
Homeland Security Investigations
501 South Las Vegas Boulevard
Las Vegas, NV 89101

IN THE MATTER OF THE SEARCH OF THE
FOLLOWING DEVICES RECOVERED FROM
THE RESIDENCE OF NORBERT
IKWUEGBUNDO:

Case No. 2:21-mj-00050-EJY

Filed Under Seal

5- White iPhone, No Visible Serial Number-**A5**

LOCATED at: Property Room
Homeland Security Investigations
501 South Las Vegas Boulevard
Las Vegas, NV 89101

IN THE MATTER OF THE SEARCH OF THE
FOLLOWING DEVICES RECOVERED FROM
THE RESIDENCE OF NORBERT
IKWUEGBUNDO:

Case No. 2:21-mj-00051-EJY

Filed Under Seal

6-Two (2) TCL Cellphones, No Visible Serial
Numbers-**A6**

LOCATED at: Property Room
Homeland Security Investigations
501 South Las Vegas Boulevard
Las Vegas, NV 89101

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2 IN THE MATTER OF THE SEARCH OF THE
3 FOLLOWING DEVICES RECOVERED FROM
4 THE RESIDENCE OF NORBERT
IKWUEGBUNDO:

5 7- Three (3) BLU Cellphones, No Visible Serial
Numbers-A7

6 LOCATED at: Property Room
7 Homeland Security Investigations
8 501 South Las Vegas Boulevard
Las Vegas, NV 89101

9 IN THE MATTER OF THE SEARCH OF THE
10 FOLLOWING DEVICES RECOVERED FROM
11 THE RESIDENCE OF NORBERT
IKWUEGBUNDO:

12 8- LG Cellphone, No Visible Serial Number-A8

13 LOCATED at: Property Room
14 Homeland Security Investigations
501 South Las Vegas Boulevard
Las Vegas, NV 89101

15 IN THE MATTER OF THE SEARCH OF THE
16 FOLLOWING DEVICES RECOVERED FROM
17 THE RESIDENCE OF NORBERT
IKWUEGBUNDO:

18 9-Motorola Model XTT962 Cellphone, No Visible
Serial Number-A9

19 LOCATED at: Property Room
20 Homeland Security Investigations
21 501 South Las Vegas Boulevard
Las Vegas, NV 89101

22 IN THE MATTER OF THE SEARCH OF THE
23 FOLLOWING DEVICES RECOVERED FROM
24 THE RESIDENCE OF NORBERT
IKWUEGBUNDO:

Case No. 2:21-mj-00052-EJY

Filed Under Seal

Case No. 2:21-mj-00053-EJY

Filed Under Seal

Case No. 2:21-mj-00054-EJY

Filed Under Seal

Case No. 2:21-mj-00055-EJY

Filed Under Seal

1 10-Motorola Tracfone Cellphone, No Visible Serial
2 Number-**A10**

3 LOCATED at: Property Room
4 Homeland Security Investigations
501 South Las Vegas Boulevard
Las Vegas, NV 89101

5 IN THE MATTER OF THE SEARCH OF THE
6 FOLLOWING DEVICES RECOVERED FROM
7 THE RESIDENCE OF NORBERT
IKWUEGBUNDO:

Case No. 2:21-mj-00056-EJY

Filed Under Seal

8 11-Two (2) Huawei Honor Cellphone, No Visible
9 Serial Numbers-**A11**

10 LOCATED at: Property Room
11 Homeland Security Investigations
501 South Las Vegas Boulevard
Las Vegas, NV 89101

12 IN THE MATTER OF THE SEARCH OF THE
13 FOLLOWING DEVICES RECOVERED FROM
14 THE RESIDENCE OF NORBERT
IKWUEGBUNDO:

Case No. 2:21-mj-00057-EJY

Filed Under Seal

15 12- Black iPhone, No Visible Serial Number-**A12**

16 LOCATED at: Property Room
17 Homeland Security Investigations
501 South Las Vegas Boulevard
Las Vegas, NV 89101

18 **MOTION TO UNSEAL**

19 COMES NOW the United States of America, by and through its attorneys,
20 CHRISTOPHER CHIOU, Acting United States Attorney, District of Nevada, and
21 Kimberly M. Frayn, Assistant United States Attorney, and represents to the Court that on
22 or about January 14, 2021, the Court issued search warrants in case numbers 2:21-mj-
23 00046-EJY to and including 2:21-mj-00057-EJY for various electronic devices related to an
24 investigation being conducted by the Immigration and Customs Enforcement, Homeland

1 Security Investigations (HSI) concerning suspected violations of federal laws. On or about
2 the same date, the Court placed the affidavit in support of these search warrants under seal
3 until further order of the Court to protect the integrity of the ongoing investigation.

4 Subsequently, the warrants were executed.

5 On or about June 30, 2021, a federal indictment issued against defendants
6 NORBERT IKWUEGBUNDO and OMONIYI OMOTERE in case number 2:21-CR-181-
7 GMN-DJA. Counsel for the defendants have requested discovery in connection with the
8 criminal prosecution in that case. The search warrants and their sealed supporting affidavit
9 are relevant to that case, and the United States Attorney's Office for the District of Nevada
10 seeks permission to produce the search warrants and their supporting affidavit in case
11 numbers 2:21-mj-00046-EJY to and including 2:21-mj-00057-EJY to the defendants
12 charged in connection with case number 2:21-CR-181-GMN-DJA.

13 WHEREFORE, the Government moves that this Court order the unsealing of the
14 affidavit supporting the search warrants in case numbers case numbers 2:21-mj-00046-EJY
15 to and including 2:21-mj-00057-EJY so that the government can produce the search
16 warrants and their supporting affidavit to the defense in the normal course of discovery.

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1 Once unsealed and produced, these documents will be subject to the Protective Order
2 issued on September 20, 2021. (2:21-CR-181-GMN-DJA, ECF 45).

3 DATED: This 21st day of September, 2021.

4 Respectfully submitted,

5 CHRISTOPHER CHIOU
6 Acting United States Attorney

7 /s/ Kimberly M. Frayn
8 KIMBERLY M. FRAYN
9 Assistant United States Attorney

10 DATED: This 21st day of September, 2021.

11 IT IS SO ORDERED.

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13 HONORABLE ELAYNA J. YOUCHAH
14 UNITED STATES MAGISTRATE JUDGE
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